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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

MONICA CONTRERAS,

Plaintiff,

v.

RONALD D. FOX; JAMES KENYON;  
PATRICIA DONINGER; CLARK COUNTY,  
NEVADA; STATE OF NEVADA, ex rel. THE  
EIGHTH JUDICIAL DISTRICT COURT,  
DOES 1-10; and ROE ENTITIES 11-20,  
inclusive,

Defendants.

Case No.: 2:13-cv-00591-JCM-PAL

**PLAINTIFF'S SECOND MOTION FOR  
LEAVE TO AMEND**

Plaintiff MONICA CONTRERAS moves this Honorable Court for an Order, pursuant to Fed.R.Civ.P. 15, granting leave to amend her Complaint. A Motion to Amend (#46) was previously filed and is pending. The present motion does not change any of the matters in the proposed Amended Complaint that was attached to that motion (#46-1). The proposed Amended Complaint, attached hereto as Exhibit 1, adds four additional legal bases for recovery related to the factual averments in the original and previously submitted proposed amended complaints.<sup>1</sup>

<sup>1</sup> No oppositions were filed to the prior motion to amend except by Defendant FOX who opposed allowing the claim for malicious prosecution against him.

**POINTS and AUTHORITIES**

Fed.R.Civ.P. 15 provides that when a party seeks to amend its pleading, the Court “should freely give leave when justice so requires.” Leave is particularly warranted since this motion is filed prior to the expiration of the scheduled last date for seeking amendment.

The new matter in the proposed amended complaint attached hereto does not alter or affect the allegations and claims for relief submitted with the pending prior motion to amend. Related to facts previously alleged, and after further review of matters in the Rule 26 disclosures and additional legal research, the proposed amended complaint submitted herewith adds additional legal bases for recovery, including claims for abuse of process, violation of First Amendment rights, and a claim against previously proposed Defendant GREGORY BRYANT asserting supervisory liability pursuant to 42 USC 1983.

**CONCLUSION**

It is respectfully requested that the Court issue an Order granting leave for the filing of the proposed Amended Complaint attached hereto.

DATED this 18<sup>th</sup> day of November, 2013.

/s/ Ross C. Goodman, Esq.  
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**CERTIFICATE OF SERVICE**

I hereby certify that on the 18<sup>th</sup> day of November, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, as follows:

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